UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRIGITTE AKWEI, DONNA SIMS and JOE DREW, individually and on behalf of all others similarly situated,

Plaintiffs,

Case No. 17-cv-06080-LGS

v.

RECKITT BENCKISER LLC,

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying October 27, 2017 letter brief submitted by Defendant Reckitt Benckiser LLC ("Defendant") in accordance with this Court's October 3, 2017 Order (Dkt. No. 14) and this Court's direction at the October 3, 2017 Initial Pretrial Conference in this matter, Defendant, by and through its counsel Sheppard, Mullin, Richter & Hampton LLP, shall move before the Honorable Lorna G. Schofield, U.S.D.J., at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1106, New York, New York 10007, on a date and time to be determined by the Court, for an Order dismissing all claims/allegations in the Class Action Complaint filed by Plaintiffs Brigitte Akwei, Donna Sims and Joe Drew, pursuant to Rule 12(b)(1) and (2) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York

October 27, 2017

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: /s/ Thomas M. Monahan

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